

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CLEMENS FRANEK,)	
)	
Plaintiff,)	Case No. 08-cv-00058
)	
vs.)	
)	
WAL-MART STORES, INC. &)	
TARGET CORPORATION,)	Judge Robert M. Dow, Jr.
)	
Defendants.)	

**AGREED MOTION FOR EXTENSION OF TIME TO ANSWER OR
OTHERWISE PLEAD**

Defendant Wal-Mart Stores, Inc. ("Wal-Mart"), by and through its attorneys, hereby respectfully moves the Court for an Order granting Wal-Mart an extension of time, up to and including March 18, 2008, in which to answer or otherwise plead to Plaintiff's Complaint. In support of this Motion, Wal-Mart states as follows:

1. Wal-Mart's answer or other responsive pleading is due on March 4, 2008.
2. Wal-Mart needs additional time to conduct an appropriate investigation of the factual and legal bases of the allegations in Plaintiff's Complaint in order to prepare a proper response thereto.
3. This Motion is not made for the purpose of delay, and Plaintiff will not be prejudiced by the short extension requested.
4. Plaintiff's counsel was contacted on March 4, 2008, and Plaintiff's counsel consents to this Motion.

WHEREFORE, Wal-Mart Stores, Inc. respectfully requests that the Court enter an Order granting an extension, up to and including March 18, 2008, within which to file an answer or other responsive pleading.

Dated: March 4, 2008

Respectfully submitted,

WAL-MART STORES, INC.

By: /s/ Jena Valdetero
One of Its Attorneys

David A. Roodman
BRYAN CAVE LLP
One Metropolitan Square
211 North Broadway, Suite 3600
St. Louis, Missouri 63102

Mark A. Paskar
Jena Valdetero
BRYAN CAVE LLP
161 North Clark Street, Suite 4300
Chicago, Illinois 60601
Telephone: (312) 602-5000
Facsimile: (312) 602-5050

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that a true and correct copy of the foregoing document was served via the court's electronic filing system this 4th day of March, 2008, to all counsels of record:

Mark D. Roth
markdroth@gmail.com

Larry L. Saret
llsaret@michaelbest.com

Arthur Gollwitzer, III
agollwitzer@michaelbest.com

Gilberto Eduardo Espinoza
geespinoza@michaelbest.com

/s/ Jena Valdetero

Jena Valdetero